

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES,)
Plaintiff,)
v.) Case No. 1:18-cv-05774-AT
NANCY ZAK,)
CLAUD CLARK III,)
ECOVEST CAPITAL, INC.,)
ALAN N. SOLON,)
ROBERT M. MCCULLOUGH,)
RALPH R. TEAL JR.,)
Defendants.)

JOINT MOTION FOR ENTRY OF FINAL JUDGMENT
AGAINST DEFENDANT NANCY ZAK

Plaintiff United States and Defendant Nancy Zak have reached a settlement agreement regarding all of the claims asserted against Ms. Zak in this case, have negotiated the terms of a consent injunction, and have filed a stipulation for entry of final judgment (ECF No. 266). Accordingly, the United States and Ms. Zak respectfully request that, pursuant to Fed. R. Civ. P. 54(b) and 65(d), the Court enter the attached (proposed) final judgment against Ms. Zak.

This motion, if granted, will significantly narrow the issues for trial, streamline discovery, and allow Ms. Zak to save the expense and time involved in further litigation.

Because there is no just reason for delay, the United States and Ms. Zak respectfully request that the Court grant this motion and enter final judgment against Ms. Zak. The attached memorandum of law provides further support for this request.

Dated: March 25, 2021

Respectfully submitted,

/s/ Erin R. Hines

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